

IN THE UNITED STATE DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
*Alexandria Division*

***JOHN DOE 2, by and through his father and  
next friend, JOHN DOE 1,***

**Plaintiffs,**

**v.**

***THE FAIRFAX COUNTY SCHOOL BOARD,***

**Defendant.**

Civil Action No. 1:18-cv-00846

Judge Leonie M. Brinkema

**PLAINTIFFS' CORRECTED MOTION FOR LEAVE TO MANUALLY FILE  
EXHIBITS 1 AND 2 TO DECLARATION OF JOHN DOE 1**

Plaintiffs respectfully request leave to manually file a DVD containing Exhibits 1 and 2 to the Declaration of John Doe 1 (Doc. No. 107-2) in support of their response to the Board's motion for summary judgment (Doc. No. 106). The disk contains the following publicly available videos:

Ex. 1: Video of WUSA 9 news segment regarding girls'-basketball scandal:

“Feds investigating Virginia school after sex harassment complaints against coach: ‘Nothing was done.’” (Jan. 4, 2018) (first video) (available at <https://www.wusa9.com/article/news/local/virginia/feds-investigating-virginia-school-after-sex-harassment-complaints-against-coach/65-504918719>)

Ex. 2: Videos regarding girls'-basketball scandal and aftermath:

“Feds investigating Virginia school after sex harassment complaints against coach: ‘Nothing was done.’” (Jan. 4, 2018) (second video) (available at <https://www.wusa9.com/article/news/local/virginia/feds-investigating-virginia-school-after-sex-harassment-complaints-against-coach/65-504918719>)

“More evidence surfaces against coach in sexual harassment case.” (Jan. 8, 2018) (available at <https://www.wusa9.com/article/news/local/burke/more-evidence-surfaces-against-coach-in-sexual-harassment-case/65-506299448>)

“Lake Braddock principal retiring following federal investigation into sex harassment by coach.” (Feb. 2, 2018) (available at <https://www.wusa9.com/article/news/local/virginia/lake-braddock-principal-retiring-following-federal-investigation-into-sex-harassment-by-coach/65-513958354>)

“Lake Braddock Secondary School principal out amid federal Title IX investigation.” (Feb. 2, 2018) (available at <http://www.fox5dc.com/news/local->

news/lake-braddock-secondary-school-principal-out-amid-federal-title-ix-investigation)

“Fairfax County schools expands principal search in the wake of harassment controversy.” (Nov. 29, 2018) (available at <http://www.fox5dc.com/news/local-news/fairfax-county-schools-expands-principal-search-in-the-wake-of-harassment-controversy>)<sup>1</sup>

Respectfully submitted,

THE CHANDRA LAW FIRM LLC

/s/ Subodh Chandra

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I certify that I filed the above document using the Clerk’s electronic-filing system, which will send notification to all counsel of record, on this 19th day of April, 2019.

/s/ Edward J. Ungvarsky

*Counsel for Plaintiffs*

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<sup>1</sup> In drafting, counsel mistakenly included that Defendant’s counsel objected to the motion and had agreed to its being heard on its paper. That sentence was a typographical error. The motion is noticed for hearing on May 3, 2019 at 10:00 am., as indicated by the accompanying Notice of Hearing.